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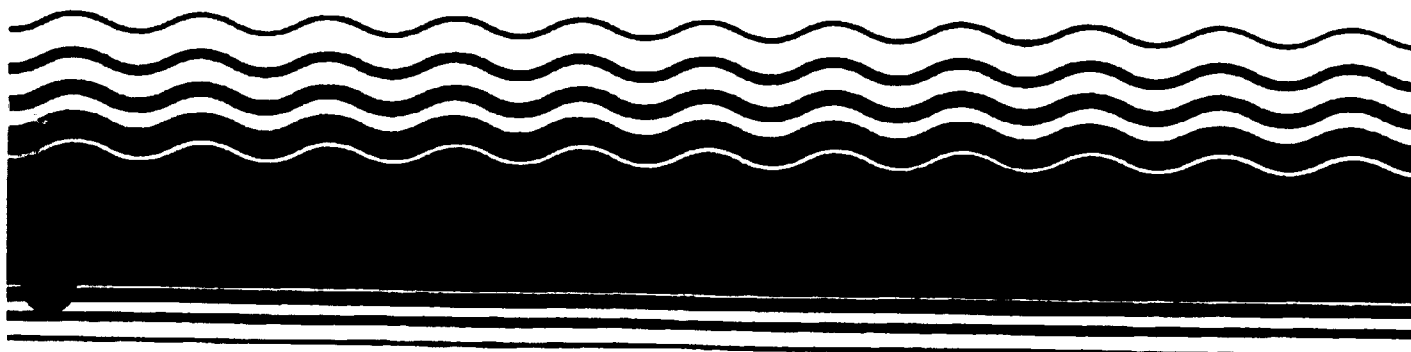
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Guidance for Performing Site Inspections Under CERCLA

Interim Final



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Guidance for Performing Site Inspections Under CERCLA

Interim Final

Hazardous Site Evaluation Division
Office of Solid Waste and Emergency Response
U.S. Environmental Protection Agency
Washington, DC 20460

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EXECUTIVE SUMMARY

This guidance presents EPA's site inspection (SI) strategy. The strategy discusses procedural guidelines to investigate potential Superfund (CERCLA) sites for evaluation pursuant to the Hazard Ranking System (HRS), revised in accordance with the Superfund Amendments and Reauthorization Act of 1986. The HRS is the primary means by which EPA evaluates sites for Superfund's National Priorities List (NPL).

EPA uses a multiphase evaluation process to determine appropriate action at Superfund sites. In the first phase, hazardous substance releases or threatened releases from a site are evaluated during two investigations: the preliminary assessment (PA) and the SI. During the PA, EPA collects background information to determine whether the SI is warranted. During the SI, EPA further evaluates the extent to which a site presents a threat to human health or the environment by, among other things, collecting and analyzing wastes and environmental media samples to determine whether hazardous substances are present at the site and are migrating to the surrounding environment. At the end of the SI, EPA decides whether the site qualifies for possible inclusion on the NPL or should be dropped from further Superfund consideration. Additionally, the SI supports removal and enforcement actions and collects data to support further Superfund or other response actions.

The SI is not intended to be a detailed extent-of-contamination or risk assessment. Efforts requiring intensive background investigation or specialized techniques are normally part of the next phase in the Superfund process after a site is placed on the NPL and becomes eligible for remedial funding.

The most efficient investigative approach for the majority of sites recommended for further action after the PA is conducted in two steps: a focused SI followed by an expanded SI, if necessary. Other sites may require only a single SI, which is a combination of a focused SI and an expanded SI.

In general, the focused SI is limited to testing PA hypotheses to determine if the site warrants further Superfund investigation. The scope of the focused SI

depends on the number of PA hypotheses requiring investigation, the questions remaining after the PA, and the number of migration and exposure pathways that significantly influence the further action recommendation. Focused SI sampling is not designed to document observed releases or observed contamination per HRS requirements. Hence, sampling during the focused SI may not include the full set of quality assurance/quality control (QA/QC) and background samples.

After the focused SI, one of three recommendations may be made:

- Site evaluation accomplished (SEA);
- Further action (e.g., expanded SI) recommended; or
- Preparation of an HRS package scheduled if all necessary data are available.

The objective of the expanded SI is to provide documentation for the HRS package to support NPL rulemaking. Remaining HRS information requirements are addressed and site hypotheses not completely supported during previous investigations are evaluated. Expanded SI sampling is designed to satisfy HRS data requirements by documenting observed releases, observed contamination, and levels of actual contamination at targets. In addition, investigators collect remaining non-sampling information. Sampling during the expanded SI includes background and QA/QC samples to fully document releases and attribute them to the site. Following the expanded SI, EPA site assessment managers assign the site a priority for HRS package preparation and proposal to the NPL.

In some cases, it may be possible to conduct a single SI instead of the focused and expanded SI. The single SI presumes that a site would not be screened by a focused SI and fulfills the functions of the expanded SI to collect analytical data and non-sampling information to complete an HRS package. The single SI is similar in scope to the expanded SI and may be appropriate for certain high priority sites that are highly likely to be placed on the NPL.